

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

*** CRIMINAL NUMBER: 10-261**

v.

*** SECTION: "K"**

SEAN HUNTER

*** VIOLATION: 18 U.S.C. § 1503**

*** * ***

Should this matter proceed to trial, both the government and the defendant, **SEAN HUNTER**, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the government would prove the following beyond a reasonable doubt at trial:

The government would establish that on or about September 5, 2005, **SHAUNA CROWDEN HUNTER** contacted the AAA insurance company to initiate a claim with respect to her 2005 BMW 525i luxury sedan and she reported to AAA that her BMW was completely submerged and was a total loss. Evidence would establish that **SHAUNA CROWDEN HUNTER** continued to exercise control over the BMW and that the vehicle was not damaged during Hurricane Katrina. On or about November 8, 2005, the AAA insurance company mailed to Shauna Crowden check no. 80401854, in the amount of \$3,442.61 and on or about November

11, 2005, the AAA insurance company mailed to BMW Financial Services check no. 80402657, in the amount of \$51,908.74, based on **SHAUNA CROWDEN HUNTER**'s representations that her BMW was completely destroyed during Hurricane Katrina.

The government would present evidence that July 20, 2007, **SEAN HUNTER** and **SHAUNA CROWDEN HUNTER** purchased another luxury vehicle and provided a false address of 805 Vouray Drive, Kenner, Louisiana in an effort to conceal the location of the BMW from law enforcement and insurance officials, including AAA. At the time of purchase, **SEAN HUNTER** executed, under oath, a Louisiana Department of Public Safety and Corrections Office of Motor Vehicles Vehicle Application, and provided a false address of 805 Vouray Drive, Kenner, Louisiana.

The government would establish that on or about October 16, 2009, **SEAN HUNTER** contacted C.B., a federal witness, and attempted to influence C.B.'s testimony in an effort to conceal, cover-up, and hide from law enforcement and insurance officials the defendants' continued use of the BMW. Specifically, **SEAN HUNTER** contacted C.B. and initiated a conversation into the federal investigation of **SEAN HUNTER**, and at that time, **SEAN HUNTER** conveyed to C.B. that he had given C.B. a check for the rental of an apartment on Vouray Drive, when in truth in fact, no such arrangement had taken place. Lastly, the government would establish that there was a federal grand jury investigation into **SEAN &**

SHAUNA HUNTER's activities at the time **SEAN HUNTER** contacted witness C.B. and the defendant knew of the federal investigation into **SEAN & SHAUNA HUNTER**.

All in violation of Title 18, United States Code, Section 1503.

BRIAN M. KLEBBA
Assistant United States Attorney

Date

MATTHEW S. CHESTER
Assistant United States Attorney

Date

ARTHUR A. LEMANN, III
Attorney for Sean Hunter

Date

SEAN HUNTER
Defendant

Date